



## Response to FDA's questions on Food Labelling

In its Request for Comments on Food Labelling, the FDA puts forward a number of questions. Below a selection of these questions are answered with respect to the Choices Programme.

*Question 1. In what product categories are nutrition symbols used (e.g., packaged foods, fresh produce, meat/poultry, seafood)?*

The Choices Programme is applicable to all food products and beverages, except alcoholic beverages, supplements, food products under medical supervision and food products for infants under the age of one year. Processed food as well as fresh food is eligible for the stamp. For retail banners have been developed to identify unpacked fruit and vegetables as Choices products. For catering services, systems have been developed to apply the qualifying criteria to whole meals and sandwiches, including those made on location (linked to a quality management audit).

*Question 2. Which symbols are nutrient specific, and which are summary symbols based on multiple nutrients?*

*Question 3. What are the nutritional criteria, including calories, included in a symbol system and how were those particular nutritional criteria chosen for inclusion?*

The Choices stamp is assigned if a product meets qualifying criteria on the four key nutrients of concern as identified by the World Health Organization: trans-fatty acids, saturated fat, sodium and sugar (Choices criteria are on added sugar). For certain categories there are also criteria for energy (calories) and dietary fibre. A product needs to comply with all criteria for that food category in order to be cleared for the Choices stamp.

*Question 4. What nutrient thresholds and/or algorithms are used to determine if a food product may display a nutrient specific or summary symbol?*

See enclosed document on the qualifying criteria of the Choices Programme.

*Question 5. Are nutrition symbols presented together with front label nutrition claims such as "low fat" or "good source of calcium" and, if so, to what extent and for what types of claims?*

In the Netherlands a back-of-pack text-box is used, stating:

*'International dietary guidelines recommend a limited intake of saturated fats, trans fat, sugars and salt (sodium) to maintain good health. This product is in line with these guidelines and should be enjoyed as part of a balanced diet and healthy lifestyle. For more information, visit [www.choicesinternational.org](http://www.choicesinternational.org)'*

We are currently in the process of checking this text against legal requirements (in Europe) and plan to have similar information in other countries as well.

*Question 6. Are there programs to educate consumers to understand the*



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*nutrition symbols or is all information contained in the symbols? When education programs are available, how are they presented?*

In countries where the Choices Programme is introduced, National Choices Organisations are set up. These are, among other duties, responsible for communication and education to the consumer.

The best example so far is the Dutch Choices Foundation (*Stichting Ik Kies Bewust*, [www.ikkiesbewust.nl](http://www.ikkiesbewust.nl)). Communication includes TV-commercials, billboards, in-shop materials, website, press briefings leading to quite some free publicity in consumer press. Participating companies make a considerable effort as well, following the communication guidelines.

*Question 7. What are consumer attitudes toward nutrition symbols?*

Research, conducted in four different countries, indicates that consumers generally appreciate front-of-pack labelling. Simple “tick” systems take them less time to evaluate, making these formats more suitable in a shopping environment. See enclosed article, recently published in *Appetite*.

Other research shows that consumers generally only glance at nutrition labels (Scott & Worsley, 1997: 92% of consumers only glanced at the nutrition label) (Base Assessment Choices Netherlands: over 50% of Dutch consumers say they take less than 10 seconds to look at nutrition and health labels, while 67% indicate they would benefit from a stamp identifying healthier products).

*Question 8. What are consumer attitudes toward products or brands that carry a nutrition symbol compared to other products or brands in the same product category (e.g., cereals) and in other categories that do not carry such a symbol?*

*Question 20. Has inclusion of nutrition symbols on the labels of food products affected the sales of those products?*

It is our intention to set up a monitoring and evaluation system in order to measure (changes in) consumer attitudes and sales figures. Again, the most advanced example is to be found in the Netherlands, where an evaluation programme is running and overseen by external scientific experts. This programme will study: effects on consumer attitudes, effects on purchasing behaviour of households, effects on sales figures, effects on reformulation and innovation efforts of industry. However, it is too early to come up with solid results.

*Question 15. Do symbols affect the nutritional quality of the total diet of consumers who use the symbols and, if so, to what extent?*

The effects of the Choices Programme on total diet has been validated for the Netherlands, calculations based on data from the national food consumption surveys (see enclosed spreadsheet). The results show a clear contribution to a healthier diet.

The Choices International Foundation is planning to produce these validations in a number of other countries.

*Question 16. To what extent, if any, have products been developed or reformulated*



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*to qualify them for a given nutrition symbol?*

The Choices Programme has two objectives: to stimulate the consumer to make the healthier choice, and to stimulate industry to develop healthier products. From contacts we have with participating companies, we have a strong impression that the Choices qualifying criteria play an important role in reformulation and innovation. Solid data are expected from the evaluation programme mentioned before, but not available yet.

One of our founding companies, Unilever, has had years of experience of improving its product portfolio according to criteria on trans-fat, saturated fat, sodium and sugar. We refer to their website for details on the quantitative results.